

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

QUANTUM TECHNOLOGY
INNOVATIONS, LLC,

Plaintiff,

v.

SHOWTIME NETWORKS INC.,
SHOWTIME DIGITAL INC., AND
PARAMOUNT GLOBAL,

Defendants.

Civil Action No. 24-cv-1103

**SECOND DECLARATION OF
MICHAEL H. JONES IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS
THE AMENDED COMPLAINT**

I, Michael H. Jones, hereby declare and state as follows:

1. I am an attorney with the firm Rothwell, Figg, Ernst & Manbeck, P.C., counsel for Defendants Showtime Networks Inc., Showtime Digital Inc., and Paramount Global (collectively, "Defendants"). I am a member in good standing of the bar of the District of Columbia and Virginia.

2. I am familiar with the facts and circumstances stated in this Declaration and respectfully submit this declaration in support of Defendants' Motion to Dismiss the Amended Complaint. The matters stated herein are based on my personal knowledge or based on existing litigation records, and if called as a witness, could competently testify thereto.

3. On February 15, 2024, Plaintiff Quantum Technology Innovations, LLC filed a complaint against Defendants asserting patent infringement of U.S. Patent No. 7,650,376. *See* Dkt. 1 at 9-11. On April 29, 2024, Defendants moved to dismiss the complaint. *See* Dkt. 21. On June 10, 2024, Plaintiff filed an Amended Complaint. *See* Dkt. 27.

4. Attached hereto as Exhibit A is a true and correct copy of U.S. Patent No. 7,650,376 (the "'376 Patent").

5. Attached hereto as Exhibit B is a true and correct copy of excerpts of the File History for the '376 Patent, which were retrieved from the USPTO's website, patentcenter.uspto.gov.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed in Crozet, VA on June 24, 2024.

/Michael H. Jones/

Michael H. Jones